



Plant Oil Powered Diesel Fuel Systems, Inc.

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September 22, 2014

By U.S. certified mail, return receipt requested

National Freedom of Information Officer
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW (2822T)
Washington, D.C. 20460

Re: Request under the Federal Freedom of Information Act, 5 U.S.C. § 552

Dear Sir or Madam:

On behalf of Plant Oil Powered Diesel Fuel Systems, Inc. ("POP Diesel"), I request that you provide the documents listed below in electronic or hard copy form within the statutory deadline following EPA's receipt of this request. POP Diesel will be happy to pay for any photocopying and search charges that are less than \$500. If you expect that these charges will exceed that amount, please let me know before exceeding it. Thank you for your courtesy in this regard.

1. All documents describing, stating or depicting any fuel quality description, standard, specification, characteristics, or qualities of 99 or 100% biofuel, biodiesel, vegetable oil, waste vegetable oil, or plant oil that you, any of the following of your officials, or other of your officials have approved in 2013 or 2014 for use in a compression ignition (diesel) engine affixed with a clean alternative fuel conversion system, other than POP Diesel's:
 - a. Mary C. McKiel, EPA Standards Executive and member of the Office of Prevention, Pesticides and Toxic Substances at Headquarters
 - b. Justin G. Gruel, Director, Diesel Engine Compliance Center, EPA Office of Transportation & Air Quality ("OTAQ") at Headquarters
 - c. John Weihrauch, Director of EPA's Fuels Compliance Center at Headquarters
 - d. Linc Wehrly, Director of EPA's Light-Duty Vehicle Center in Ann Arbor, Michigan
 - e. Michael Sabourin, Program Engineer, Compliance Division, OTAQ in Ann Arbor
 - f. Fakhri J. Hamady, Technical Advisor, Compliance Division, OTAQ in Ann Arbor
 - g. Steven D. DeBord, Compliance Division, Diesel Engine Compliance Center, OTAQ at Headquarters

- h. Gregory Orehowsky, Compliance Division, OTAQ at Headquarters
 - i. Janet Cohen, EPA Headquarters
 - j. James W. Caldwell, Ruel Compliance Center at Headquarters
- 2. All documents describing, stating or depicting any fuel quality description, standard, specification, characteristics, or qualities of 99 or 100% biofuel, biodiesel, vegetable oil, waste vegetable oil, or plant oil that you, any of the following of your officials, or other of your officials have approved in 2013 or 2014 for use in the diesel engine clean alternative fuel conversion system of Optimus Technologies:
 - a. Mary C. McKiel, EPA Standards Executive and Member of the Office of Prevention, Pesticides and Toxic Substances at Headquarters
 - b. Justin G. Gruel, Director, Diesel Engine Compliance Center, EPA Office of Transportation & Air Quality ("OTAQ") at Headquarters
 - c. John Weihrauch, Director of EPA's Fuels Compliance Center at Headquarters
 - d. Linc Wehrly, Director of EPA's Light-Duty Vehicle Center in Ann Arbor, Michigan
 - e. Michael Sabourin, Program Engineer, Compliance Division, OTAQ in Ann Arbor
 - f. Fakhri J. Hamady, Technical Advisor, Compliance Division, OTAQ in Ann Arbor
 - g. Steven D. DeBord, Compliance Division, Diesel Engine Compliance Center, OTAQ at Headquarters
 - h. Gregory Orehowsky, Compliance Division, OTAQ at Headquarters
 - i. Janet Cohen, EPA Headquarters
 - j. James W. Caldwell, Ruel Compliance Center at Headquarters
- 3. All documents describing, stating or depicting any fuel quality description, standard, specification, characteristics, or qualities of 99 or 100% biofuel, biodiesel, vegetable oil, waste vegetable oil, or plant oil that you, any of the following of your officials, or other of your officials have approved in 2013 or 2014 for production, sale or use as "Vector" fuel in the clean alternative fuel conversion system of Optimus Technologies or by a company called Lifecycle Renewables:
 - a. Mary C. McKiel, EPA Standards Executive and Member of the Office of Prevention, Pesticides and Toxic Substances at Headquarters
 - b. Justin G. Gruel, Director, Diesel Engine Compliance Center, EPA Office of Transportation & Air Quality ("OTAQ") at Headquarters
 - c. John Weihrauch, Director of EPA's Fuels Compliance Center at Headquarters
 - d. Linc Wehrly, Director of EPA's Light-Duty Vehicle Center in Ann Arbor, Michigan
 - e. Michael Sabourin, Program Engineer, Compliance Division, OTAQ in Ann Arbor
 - f. Fakhri J. Hamady, Technical Advisor, Compliance Division, OTAQ in Ann Arbor

- g. Steven D. DeBord, Compliance Division, Diesel Engine Compliance Center, OTAQ at Headquarters
 - h. Gregory Orehowsky, Compliance Division, OTAQ at Headquarters
 - i. Janet Cohen, EPA Headquarters
 - j. James W. Caldwell, Ruel Compliance Center at Headquarters
4. All written communications between any of the following of your officials or any of your other officials and either Colin Huwyler of Optimus Technologies, Jonathan Ewing of Optimus Technologies, Rory Gaunt of Lifecycle Renewables, any other representative of Optimus Technologies or Lifecycle Renewables, or any official of ASTM International's Petroleum Products Committee (including but not limited to Randy Jenkins, Steve Westbrook, Barbara Parry, Marie Calhoun, Ramon Benavides, Jim Thomas, David Bradley, Len Morrissey, Robert Morgan, Pat Picariello, and Kevin Shanahan) on the subject of any fuel quality description, standard, specification, characteristics, or qualities for the use of 99 or 100% biofuel, biodiesel, vegetable oil, waste vegetable oil, or plant oil in diesel engines equipped with, or to be equipped with, an EPA-approved clean alternative fuel conversion system:
- a. Mary C. McKiel, EPA Standards Executive and Member of the Office of Prevention, Pesticides and Toxic Substances at Headquarters
 - b. Justin G. Gruel, Director, Diesel Engine Compliance Center, EPA Office of Transportation & Air Quality ("OTAQ") at Headquarters
 - c. John Weihrauch, Director of EPA's Fuels Compliance Center at Headquarters
 - d. Linc Wehrly, Director of EPA's Light-Duty Vehicle Center in Ann Arbor, Michigan
 - e. Michael Sabourin, Program Engineer, Compliance Division, OTAQ in Ann Arbor
 - f. Fakhri J. Hamady, Technical Advisor, Compliance Division, OTAQ in Ann Arbor
 - g. Steven D. DeBord, Compliance Division, Diesel Engine Compliance Center, OTAQ at Headquarters
 - h. Gregory Orehowsky, Compliance Division, OTAQ at Headquarters
 - i. Janet Cohen, EPA Headquarters
 - j. James W. Caldwell, Ruel Compliance Center at Headquarters
4. All written guidelines or policies you have adopted governing fuel quality, a fuel description, a fuel standard, a fuel specification, fuel characteristics, or fuel qualities for the use of 99 or 100% biofuel, biodiesel, vegetable oil, waste vegetable oil, or plant oil in diesel engines equipped with an EPA-approved clean alternative fuel conversion system. The above-listed EPA officials would be the most likely to have any such documents.

5. All written documents, other than those provided you by POP Diesel, informing your decisions concerning the fuel quality, a fuel description, a fuel standard, a fuel specification, fuel characteristics, or fuel qualities for the use of 99 or 100% biofuel, biodiesel, vegetable oil, waste vegetable oil, or plant oil in diesel engines equipped with an EPA-approved clean alternative fuel conversion system. The above-listed EPA officials would be the most likely to have any such documents.
6. All emissions data and test results furnished to you by Optimus Technologies for all testing Optimus Technologies reported to you in notifying you of their clean alternative fuel conversion system on light duty on-highway, medium duty on-highway, heavy duty on-highway, or stationary diesel engines or diesel electrical generator sets. The above-listed EPA officials would be the most likely to have any such documents.
7. All data and laboratory results furnished to you by Optimus Technologies describing any characteristic or quality of the biofuel they used, including test methods or specifications used, in emissions testing as part of their notifying you of their clean alternative fuel conversion system on light duty on-highway, medium duty on-highway, heavy duty on-highway, or stationary diesel engines or diesel electrical generator sets, being sure please to identify the name or kind of biofuel associated with each page of data or laboratory results. The above-listed EPA officials would be the most likely to have any such documents.

Thank you for your and your officials' expected compliance with this request. Please do not hesitate to contact me if you have any questions.

Sincerely yours,



Claude D. Convisser,
President & General Counsel